

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**JAMES RIVER EQUIPMENT,
VIRGINIA, LLC, a Virginia Limited
Liability Company,**

PLAINTIFF,

v.

**Civil Action No. 5:13-cv-28160
Honorable Irene Berger**

**JUSTICE ENERGY COMPANY, INC. a
West Virginia Corporation,**

DEFENDANT.

**PLAINTIFF JAMES RIVER EQUIPMENT VIRGINIA, LLC'S SECOND MOTION
FOR CONTEMPT AND MOTION FOR SANCTION OF IMPRISONMENT OF
OFFICERS AND DIRECTORS UNTIL JUSTICE ENERGY COMPANY, INC.
COMPLIES WITH COURT ORDER**

NOW COMES Plaintiff James River Equipment Virginia, LLC (hereinafter referred to as "James River"), through counsel, Jason S. Hammond and the law firm Bailey & Wyant, PLLC, and hereby move this Court to enter an Order finding Defendant and/or its agent Roman Semenov in contempt of Court and to impose the sanction of imprisonment upon the officers and directors of Justice Energy Company, Inc. in order to coerce compliance with this Court's orders. In further support thereof, please see the contemporaneously filed Memorandum of Law in Support of Plaintiff James River Equipment, Virginia, LLC's Motion for Contempt and Sanction of Imprisonment.

WHEREFORE, based upon the forgoing, Plaintiff prays this Court will enter an Order finding Justice Energy and Roman Semenov in contempt of Court, issue such sanctions as the Court deems appropriate to coerce obedience and compensate Plaintiff for the losses sustained, as well as enter all other relief deemed just and proper.

**JAMES RIVER EQUIPMENT, VIRGINIA,
LLC
By Counsel,**

/s/ Jason S. Hammond
Jason S. Hammond (WV Bar #8042)
BAILEY & WYANT, PLLC
500 Virginia Street, East, Suite 600
Post Office Box 3710
Charleston, West Virginia 25337-3710
T: 304.345.4222
F: 304.343.3133
jhammond@baileywyant.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**JAMES RIVER EQUIPMENT,
VIRGINIA, LLC, a Virginia Limited
Liability Company,**

PLAINTIFF,

v.

**Civil Action No. 5:13-cv-28160
Honorable Irene Berger**

**JUSTICE ENERGY COMPANY, INC. a
West Virginia Corporation,**

DEFENDANT.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing "PLAINTIFF JAMES RIVER EQUIPMENT VIRGINIA, LLC'S SECOND MOTION FOR CONTEMPT AND MOTION SANCTION OF IMPRISONMENT" was served upon the following parties through the Court's Electronic Case Filing (ECF) system, U.S. Mail and facsimile on this day, Wednesday, September 30, 2015:

Justice Energy Company, Inc.
c/o Roman Semenov
100 Cranberry Creek Drive
Beckley, West Virginia 25801

/s/ Jason S. Hammond

Jason S. Hammond (WV Bar #8042)

BAILEY & WYANT, PLLC

500 Virginia Street, East, Suite 600

Post Office Box 3710

Charleston, West Virginia 25337-3710

T: (304) 345-4222

F: (304) 343-3133

[Jhammond@baileywyant.com](mailto:jhammond@baileywyant.com)